

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PAIN MANAGEMENT
TECHNOLOGIES, INC.

Plaintiff,

v.

MURRAY ELECTRONICS
ASSOCIATES, LP

Defendant.

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Civil Action No. 5:09cv1546

Judge Gaughan

Magistrate Judge Gallas

**STIPULATED MOTION FOR
EXTENSION OF TIME TO MOVE
OR PLEAD IN RESPONSE TO
PLAINTIFF'S COMPLAINT AND
REQUEST FOR POSTPONEMENT OF
THE CASE MANAGEMENT
CONFERENCE**

Now comes Defendant, Murray Electronics Associates, LP (“Defendant”), by and through counsel, and hereby moves this Court for an extension of time in which to respond to Plaintiff’s Complaint and for a postponement of the Case Management Conference currently scheduled for September 11, 2009. Defendant’s answer or response to the Complaint was due on July 31, 2009. The parties previously stipulated to and the Court granted an extension until August 31, 2009. Defendant now requests an additional extension until September 30, 2009. The Case Management Conference has been set for September 11, 2009. Defendant requests that the conference be postponed. In support of the requests, Defendant states that (1) Plaintiff consents to the requested extension and postponement of the Case Management Conference; (2) the parties are currently exchanging information in an effort to settle the case, yet the factual investigation may not be completed by August 31, 2009; and (3) this Motion is made during the time available for filing a response to the Complaint.

For the foregoing reasons, Defendant respectfully requests that this Court enter an Order granting Defendant an extension of time through September 30, 2009 to move, plead, or otherwise respond to Plaintiff's Complaint postponing the Case Management Conference currently set for September 11, 2009.

Respectfully submitted,

/s/ Gregory J. Krabacher
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Counsel for Plaintiff
Pain Management Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2009 a copy of the foregoing Stipulated Motion for Extension of Time to Move, Plead, or otherwise Respond to Plaintiff's Complaint and for Postponement of Case Management Conference was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Gregory J. Krabacher